



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

November 22, 2010

Ms. Linda Gehrke, Deputy Regional Administrator
Federal Transit Administration
Jackson Federal Building, Suite 3142
915 Second Ave.
Seattle, Washington 98174

Re: South Corridor Portland-Milwaukie Light Rail Project Final Environmental Impact
Statement (EPA Region 10 Project Number 98-028-FTA)

Dear Ms. Gherke:

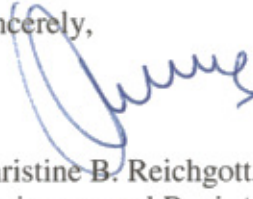
The U.S. Environmental Protection Agency (EPA) has reviewed the South Corridor Portland-Milwaukie Light Rail Project Final Environmental Impact Statement (FEIS). Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

We wish to commend the Federal Transit Administration (FTA) for your work to prepare this EIS, and for your responsiveness to our comments on the Draft Supplemental EIS and preliminary Final EIS. Our comments regarding water quality, hydrology, hazardous materials, and monitoring have been addressed. We are also pleased to note that TriMet is assessing the use of incentives with contractors to encourage best management practices with respect to air quality and diesel-powered equipment during construction (p. 3-249). These incentives would be for using low-sulfur fuel for diesel equipment and cleaner fuels for other equipment, properly maintaining equipment, reducing idling, retrofitting diesel engines with verified technologies, and replacing older equipment and engines -- all helpful strategies for reducing construction emissions. We encourage FTA to share the results of TriMet's assessment when it becomes available.

An especially noteworthy feature of the FEIS is the inclusion of climate change considerations -- both with respect to project contributions to greenhouse gas emissions (GHGs), and with respect to the potential effects of climate change on the project. Appendix O (pages 22-23) provides helpful estimates of potential increase in Willamette River water levels, effects of sea level rise, and a resulting overall estimate of increase in Willamette River level due to global climate change by 2099. This estimate was also used to evaluate effects on vessel passage rates. The methodology for deriving these estimates would be a welcome addition to the Appendix, as it could serve to inform and stimulate others to incorporate these considerations.

We appreciate the opportunity to comment, and thank you for a job well done. If you would like to discuss the project further or have questions regarding our comments, please feel free to contact Elaine Somers of my staff at (206) 553-2966, or me at (206) 553-1601.

Sincerely,


for

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit